

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DORNELLA CONNER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No.
	)	
JOHN DOE I, ST. LOUIS COUNTY	)	
POLICE OFFICER	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

Defendant St. Louis County respectfully submits this Notice of Removal of Action (the “Notice”) to the United States District Court for the Eastern District of Missouri, Eastern Division, pursuant to 28 U.S.C. §1441, et seq. In support of this Notice, Defendant states:

1. Plaintiff Dornella Conner initiated a civil action by filing a Petition in the Circuit Court of St. Louis County, Missouri, Cause No. 15SL-CC02103 (the “State Court”). Pursuant to 28 U.S.C. §1446(a) and Eastern District Rule 81-2.03, a complete copy of the State Court file in this action is attached hereto and filed herewith as Exhibit A.
2. No further proceedings have taken place in the State Court as of the date of filing of the Notice of Removal.
3. Defendant St. Louis County was served with the First Amended Petition and summons on October 16, 2015. Neither of the John Doe defendants has been identified or served.
4. The Petition contains allegations that Defendant St. Louis County is a municipality in the State of Missouri, which violated plaintiff’s civil rights and constitutionally guaranteed rights to be free from the use of excessive force, life, due process under

the law, and equal protection under the law. The Petition also contains allegations that defendants' actions were in violation of the Fourth Amendment to the Constitution of the United States, and that the John Doe officers acted under color of law. Plaintiff seeks recovery pursuant to "the Missouri and Federal Constitutions, as well as the statutes pertaining to same."

5. Pursuant to 28 U.S.C. Section 1446(b), Defendant St. Louis County timely file this Notice.
6. This Court has jurisdiction under 28 U.S.C. §1331, and this action is subject to removal under 28 U.S.C. §1441.
7. The Original Filing Form is attached to this Notice of Removal as Exhibit B.
8. The Civil Cover Sheet is also attached to this Notice of Removal as Exhibit C.

WHEREFORE, Defendant St. Louis County removes this action to the United States District Court for the Eastern District of Missouri pursuant to 28 U.S.C. §§1441 et seq.

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CERTIFICATE OF SERVICE

A copy of this pleading was served on all counsel of record through the Court's electronic filing system this 13<sup>th</sup> day of November, 2015.

Priscilla F. Gunn